

### REMARKS

This communication is responsive to the Office Action mailed November 19, 2002. Claims 20, 28, and 29 have been amended. Fifteen claims (3 independent and 12 dependent) remain pending in this Application. No new matter has been added. Applicant believes that no fee is required by this response; should any fee be necessary (including any fees for extensions of time or additional claims), however, the Commissioner is authorized to deduct such fee from Deposit Account 19-2814. **This response is being filed by facsimile only.**

#### **A. The Schein Reference**

In rejecting all pending claims under 35 U.S.C. § 103 based on U.S. Pat. No. 6,226,623 ("Schein") in view of U.S. Patent No. 6,047,267 ("Owens"), the Final Office Action essentially maintains the position taken in the previous Office Action. Applicant respectfully traverses the rejection in that neither of the references, taken alone or in combination, describes each and every limitation found in the claims as amended. Furthermore, there is no suggestion to combine the references as suggested by the Examiner.

##### *1. Key Object Classes and Secondary Object Classes*

Neither of the cited references include a system which includes objects that are "instances of one or more key object classes and one or more secondary object classes, wherein said key object classes partition said database in accordance with a high-level category, and wherein said secondary classes depend from said key object classes" as recited in the claims as amended. This element, which improves efficiency and object re-use in the design and creation of stored value products, is not suggested, inferred, or otherwise disclosed by any combination of the art of record.

##### *2. Stored value products associated with at least one client system*

The independent claims (claims 20, 28, and 29) clearly recite that each of the stored value products is associated with at least one of a plurality of client systems. This feature enables multiple stored value programs to be created and administered from a common platform. Although each of the stored value programs may be created from a common

repository of objects and may share data using a common server interface, each stored value product is associated with a separate client system. As stated previously, this benefit provides great advantages over the prior art systems of record. In particular, the invention allows multiple clients to create individualized stored value programs in a quick and easy fashion using a common repository of objects.

The Schein reference describes a communication and messaging network for use by a bank (see, e.g., Abstract and col. 9, lines 1-13). The Schein system merely allows customers and bankers to access their various personal banking records (including checking and savings accounts, investment accounts, mortgages and the like) from remote locations (such as branch offices or from home) via telephone, personal computer, etc. (see, e.g., col. 10, lines 14-27). Schein in no way creates, administers or facilitates multiple stored value products (e.g. smartcard programs).

In the Final Office Action, the Examiner asserts that Schein discloses, for example, that Visa Corporation and other financial institutions and networks may use their invention. The Schein makes no mention, however, of the complicated systems and methods of stored value products, capturing transaction data, or routing transaction data which are part of the presently claimed invention.

Furthermore, while the list of banking services merely includes the term smart cards, no mention whatsoever is made of "client systems associated with at least one of the plurality of stored value products" (emphasis added) as recited in the pending claims and as described in the present Specification.

### 3. *Database of stored value products*

As noted in Applicant's response to the previous Office Action, the Schein reference is not directed at the creation, modification, or the operation of stored value products, and as such would have no reason to contemplate a database or repository of objects suited for such a purpose. Accordingly, the Schein reference simply includes the term smart card; yet, it fails to expressly or impliedly disclose a complex system "wherein each of said stored value products comprises a plurality of objects retrieved from said database, and wherein each of said plurality of objects provides a function that is available to each of the plurality of stored

value products such that each of said plurality of stored value products is allowed to retrieve said customer data and said merchant data from said database," as recited in claim 20. Similarly, the reference fails to disclose each and every element of independent claims 28 and 29, particularly a database or repository including a plurality of objects.

In the Final Office Action, the Examiner argues that the Schein reference (Col. 17, line 37 - Col. 18, line 8.) discloses that the system may add or create relationships and records between users and clients based upon other criteria in the future. The Examiner also argues that Schein discloses that banks offer additional products or servers and that customers may open accounts. Applicants respectfully submit that, even if it is assumed *arguendo* that Schein discloses the addition or creation of accounts and relationships between a bank and its clients, such functionality is not the same as a complex database of objects associated with stored value products as recited in the pending claims.

4. *Administering stored value products and facilitating financial transactions*

The Schein reference also does not disclose an element directed at "a system for creating and administering a plurality of stored value products, a server facilitating the operation of a plurality of stored value programs," and/or "a method of facilitating financial transactions at a server" as recited by the three independent claims.

B. **The Owens reference**

Similarly, the Owens reference fails to disclose or suggest the remaining elements in the pending claims. The reference is described as disclosing "an object-oriented design in a multi-product, online and Internet environment". Applicant does not dispute that Owens generally describes an online system that is implemented using an object-oriented model; however, the Owens disclosure is far removed from the field of the present invention. Owens deals specifically with a program (such as an online wallet) that could be used by Internet consumers to purchase goods or track funds using various bank accounts. The reference in no way deals with the complex methods and systems for creating, administering or facilitating stored value programs, nor does it deal with an intricate back-end transaction processing system of any sort. Accordingly, there is no suggestion or motivation to combine

the two references without impermissibly using Applicant's claims as a guide. Moreover, even the cited combination of the two references does not disclose a system that would allow the complex hardware and software required for the creation or administration of multiple stored value programs on multiple client systems, as recited by the amended claims and as described more fully above.

The references, taken individually or in combination, do not describe a system for creating and/or facilitating a stored value program/product, nor do either (or both) describe a system for facilitating stored value products/programs associated with a plurality of client systems, as recited by the various independent claims. Because even the combination of the cited references fails to anticipate each and every element of the independent claims, the dependent claims are believed to be patentable *a fortiori* and a detailed response to each of the dependent claim rejections is not necessary at this time. Nevertheless, Applicant reserves the right to independently demonstrate the patentability of any element found in the dependent claims at a later date.

**B. Conclusion**

In conclusion, Applicant respectfully submits that the present application is in condition for allowance, and earnestly solicits a Notice of Allowance at the Examiner's earliest convenience. If the Examiner determines that a Notice of Allowance is not appropriate at this time, **Applicant respectfully requests an Advisory Action since this Response is submitted within two months of the mailing date of the Office Action.** The Examiner is invited to telephone the undersigned if such would advance prosecution of this Application in any way.

Dated this 21st day of January, 2003.

Respectfully submitted on behalf of  
AMERICAN EXPRESS TRAVEL RELATED  
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By 

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**Version with Markings Showing Changes Made**

20. A system for creating and facilitating a plurality of stored value products, the system comprising:
- a plurality of client systems, each of said client systems being associated with at least one of the plurality of stored value products;
  - a database facilitating the storage and retrieval of customer data, merchant data, and a plurality of objects, said objects being instances of one or more key object classes and one or more secondary object classes, wherein said key object classes partition said database in accordance with a high-level category, and wherein said secondary classes depend from said key object classes;
  - a transaction capture module configured to receive transaction data from a point-of-sale terminal configured to accept at least one of said plurality of stored value products; and
  - a database server configured to support said stored value products, to receive said transaction data from said transaction capture module, and to route said transaction data among said plurality of stored value products executing on said plurality of client systems;
- wherein each of said stored value products comprises a plurality of objects retrieved from said database, and wherein each of said plurality of objects provides a function that is available to each of the plurality of stored value products, and wherein each of said plurality of stored value products is allowed to retrieve said customer data and said merchant data from said database using at least a portion of said plurality of objects.
28. A server facilitating the operation of a plurality of stored value programs, each of said stored value programs being associated with one of a plurality of client systems, the server comprising a digital computer in communication with a database maintaining

consumer information, merchant information and a plurality of objects, wherein each of said plurality of objects is configured to facilitate a particular function and to associate with each of said plurality of stored value programs, said objects further being instances of one or more key object classes and one or more secondary object classes, wherein said key object classes partition said database in accordance with a high-level category, and wherein said secondary classes depend from said key object classes; and wherein each of said plurality of stored value programs accesses said consumer information and said merchant information via at least one of said plurality of objects such that said consumer information and said merchant information is available to each of said plurality of financial products through a common interface available from the plurality of client systems.

29. A method of facilitating financial transactions at a server, the method comprising the steps of:

selecting a first plurality of objects from a repository of objects to form a first stored value program, said first stored value program corresponding to a first financial product and being associated with a first client system, said objects being instances of one or more key object classes and one or more secondary object classes, wherein said key object classes partition said database in accordance with a high-level category, and wherein said secondary classes depend from said key object classes;

selecting a second plurality of objects from said repository of objects to form a second stored value program, said second stored value program corresponding to a second financial product and being associated with a second client system; and

accessing a database comprising consumer information and merchant information by said first and second client systems such that said first and second stored value programs interact with said database via said first and second pluralities of objects, respectively, to implement said

first and second financial products on said first and second client  
systems, respectively.